

**FILED**

DEC 21 2022

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

ALEXANDRIA COLLINS,

Defendant.

4:22-cr-721 SRC/SRW

**MOTION FOR PRE-TRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Tracy Lynn Berry, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held ten (10) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3142(d).

As and for its grounds, the Government states as follows:

1. Defendant is charged with a violation of Title 18, United States Code, Section 1001(a)(3), to wit, making and using a false statement to an agency of the judicial branch of the federal government.
2. Pursuant to Title 18, United States Code, Section 3142(g), defendant's detention pending trial is warranted by: the weight of the evidence; her history and characteristics, including being on supervised release at the time of the offense; and the nature and seriousness of the economic danger to any person or the community that would be posed by Defendant's release.

3. The defendant is an economic threat to the community.

4. There is a serious risk that the defendant will obstruct or attempt to obstruct justice, or threaten, injure or intimidate, or attempt to threaten, injure or intimidate a prospective witness or juror because, while on supervised release, Defendant made a false statement to law enforcement in order to impede in the criminal investigation of United States v. Ricky Johnson, No. 4:22CR00468 HEA/SPM.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing ten (10) days from the date of defendant's initial appearance.

Respectfully submitted,

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